

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

UNITED STATES OF AMERICA	:	CRIMINAL NO. 08 - 252
v.	:	DATE FILED: May 1, 2008
SANUSI BAH	:	VIOLATIONS:
	:	18 U.S.C. § 1546(a) (possession of
	:	fraudulent immigration document – 1
	:	count)
	:	18 U.S.C. § 1028(a)(4) (possession of
	:	fraudulent identification document – 1
	:	count)
	:	18 U.S.C. § 1028(a)(6) (possession of a
	:	unlawfully produced identification
	:	document – 1 count)

INDICTMENT

COUNT ONE

THE GRAND JURY CHARGES THAT:

On or about March 4, 2008, in Philadelphia, in the Eastern District of
Pennsylvania, defendant

SANUSI BAH

knowingly possessed a document required for employment in the United States, that is, a forged, counterfeited, altered, and falsely made Employment Authorization Card (“Form I-766”), purportedly valid from August 27, 2007 to August 26, 2008, bearing defendant BAH’s photograph, which defendant BAH knew to be forged, counterfeited, altered, falsely made, and procured by fraud and unlawfully obtained.

In violation of Title 18, United States Code, Section 1546(a).

COUNT TWO

THE GRAND JURY FURTHER CHARGES THAT:

On or about March 4, 2008, in Philadelphia, in the Eastern District of Pennsylvania, defendant

SANUSI BAH

knowingly possessed an identification document other than one issued lawfully for his use, that is, an Employment Authorization Card, ("Form I-766"), purportedly valid from August 27, 2007 to August 26, 2008, bearing defendant BAH's photograph, with the intent that such document be used to defraud the United States.

In violation of Title 18, United States Code, Section 1028(a)(4).

COUNT THREE

THE GRAND JURY FURTHER CHARGES THAT:

On or about March 4, 2008, in Philadelphia, in the Eastern District of Pennsylvania, defendant

SANUSI BAH

knowingly possessed identification documents that were or appear to have been identification documents of the United States which were produced without lawful authority, that is, a counterfeit Social Security Card, and an Employment Authorization Card, knowing that such documents were produced without such lawful authority.

In violation of Title 18, United States Code, Section 1028(a)(6).

A TRUE BILL:

GRAND JURY FOREPERSON

PATRICK L. MEEHAN
United States Attorney